# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA SOUTHERN DIVISION

CURLY YOUNG,	)
Plaintiff,	)
	)
VS.	) CIVIL ACTION NO.:
	) 6-563
HONEYWELL TECHNOLOGY	)
SOLUTIONS, INC.,	)
	)
Defendant.	)

## WITNESSES LIST

**Curly Young** 705 Mill Ave. Entreprise, AL 36330

Jerry Temple C/O of Honeywell Technology Solutions, Inc.

Ken Erikson C/O of Honeywell Technology Solutions, Inc.

Calvin Flowers C/O of Honeywell Technology Solutions, Inc.

Jimmy Hines C/O of Honeywell Technology Solutions, Inc.

Larry Cophen C/O of Honeywell Technology Solutions, Inc. Thomas Lavar

C/O of Honeywell Technology Solutions, Inc.

Roger and Travis Engles

C/O of Honeywell Technology Solutions, Inc.

Pat Little

C/O of Honeywell Technology Solutions, Inc.

David Husey

C/O of Honeywell Technology Solutions, Inc. Pat Little's immediate supervisor

Roger Ingells, Jimmy Hinds, Chris Holland C/O of Honeywell Technology Solutions, Inc.

Carolyn Woodburn

C/O of Honeywell Technology Solutions, Inc.

Doug Reston

C/O of Honeywell Technology Solutions, Inc.

William Culpeper

C/O of Honeywell Technology Solutions, Inc.

### **DOCUMENTS**

Termination letter March 5, 2005 disciplinary Honeywell policies and procedures manual ATTACHED TO BRIEF IN SUMMARY JUDGMENT:

- 1. Jerry Temple deposition
- 2. Kenneth Erickson deposition
- 3. Discipline policy
- 4. Cardinal Safety Rules of Honeywell
- 5. April 05 Update on Chris Hines
- 6. Curley Young Update

- 7. Report of Incident/Accident
- 8. Curley Young Update, third/fourth quarter update
- 9. Developmental Counseling Form
- 10. Truck and Tools Box at the close the business day-3/19/03
- 11. Incident on Thursday, September 28, 2000 from Jimmy Hodge to Curley Young
- 12. March 3, 2000 Memo to Jerry Temple
- 13. Memo to Young personnel file from Jerry Temple dated 24 November 2004
- 14. Awards of Curley Young
- 15. Curley Young evaluations
- 16. Temple evaluations
- 17. Notes from the files of Human Resource Specialist, Shawnda Hunt, dated 2004–See affidavit of James Garrett, para 12.

#### **DAMAGES**

equitable damages, including, but not limited to, lost wages and benefits, future lost wages, compensatory and punitive damages.

/s/ Jeff Bennitt

Jeffrey W. Bennitt ASB N51J BENOO4

Jeff Bennitt & Associates, LLC, Suite A-3 4898 Valleydale Rd., Birmingham, Al 35242 (205) 408-7240 fax: (205) 408-9236 e-mail: Bennittlaw@aol.com

#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the above was served on the defendant corporation and former counsel by mail/email on February 15, 2008. Sandra Beth Reiss sandra.reiss@odnss.com, cheryl.hosey@odnss.com

S/	Jeff Bennitt	